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Proposed Attorneys for Debtor and Debtor in
Possession, Coastal International Inc.

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
SANTA ANA DIVISION

In re
COASTAL INTERNATIONAL INC.,
Debtor.

Case No. 8:19-bk-13584-TA
Chapter 11

**NOTICE OF EX PARTE MOTION AND EX
PARTE MOTION FOR AN ORDER
EXTENDING TIME WITHIN WHICH
DEBTOR MUST FILE SCHEDULES OF
ASSETS AND LIABILITIES AND
STATEMENT OF FINANCIAL AFFAIRS
AND OTHER REQUIRED DOCUMENTS
AS LISTED IN THE COURT'S
DEFICIENCY NOTICE PURSUANT TO
FEDERAL RULE OF BANKRUPTCY
PROCEDURE 1007(c) AND LOCAL
BANKRUPTCY RULE 1007;
MEMORANDUM OF POINTS AND
AUTHORITIES AND DECLARATION OF
REEM J. BELLO IN SUPPORT THEREOF**

[No Hearing Unless Required]

**TO THE HONORABLE THEODOR C. ALBERT, UNITED STATES BANKRUPTCY
JUDGE, THE OFFICE OF THE UNITED STATES TRUSTEE, AND ALL OTHER
INTERESTED PARTIES:**

PLEASE TAKE NOTICE that Coastal International Inc., debtor and debtor-in-
possession in the above-captioned cases (the "Debtor"), hereby moves (the "Motion") ex
parte for an order extending the time within which the Debtor must file its Schedules of

1 Assets and Liabilities (the “Schedules”), Statement of Financial Affairs (“SOFA”), and any
2 other documents required to be filed pursuant to any Case Commencement Deficiency
3 Notices or other similar notice issued by the Court (the “Deficiency Documents,” and
4 together with the Schedules and the SOFA, the “Documents”) pursuant to Rule 1007(c) of
5 the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and Rule 1007-1(b)
6 of the Local Bankruptcy Rules (the “Local Rules”).

7 The Motion is based on this Notice and Motion, the following Memorandum of
8 Points and Authorities, and the Declaration of Reem J. Bello (the “Bello Declaration”).

9 **PLEASE TAKE FURTHER NOTICE** that the Debtor requests that this Motion be
10 considered on an ex-parte basis. The Documents are currently due on September 30,
11 2019. By the Motion, the Debtor requests an extension of fourteen (14) days, through and
12 including October 14, 2019, to file the Documents. If the Debtor was to set this matter on
13 regular notice, the deadline for filing the Documents will have passed prior to the Court’s
14 consideration of the relief requested by the Debtor. The Debtor would then either have to
15 file incomplete or insufficient Documents by September 30, 2019, or violate the
16 Bankruptcy Rules and Local Rules by failing to file the Documents.

17 Pursuant to Local Rules 1007-1(b) and 9013-1(p), the Court may grant the Motion
18 without a hearing upon notice to certain parties-in-interest.

19 Dated: September 30, 2019

WEILAND GOLDEN GOODRICH LLP

21 By: /s/ Reem J. Bello

JEFFREY I. GOLDEN

REEM J. BELLO

Proposed Attorneys for Debtor and
Debtor-in-Possession

MEMORANDUM OF POINTS AND AUTHORITIES

I. INTRODUCTION

The above-captioned Debtor in this chapter 11 case (the “Case”) is required to file complete and accurate Schedules, SOFA, and Deficiency Documents. The Debtor has been diligent in its efforts in this case including preparation and adjudication of several “first day” motions, responding to inquiries from creditor and interested parties and completion and filing of the 7-day package to the Office of the United States Trustee.

As such, although the Debtor has made significant progress with respect towards completing the Documents, the Debtor requires a short extension of fourteen (14) days in addition to the fourteen (14) days allowed by the Bankruptcy Rules. The Debtor submits that this extension is reasonable and will allow them to file more accurate and complete Documents, benefitting all parties-in-interest.

II. BACKGROUND

A. Bankruptcy Petitions

On September 15, 2019 (the “Petition Date”), the Debtor filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code in the United States Bankruptcy Court for the Central District of California (the “Court”). The Debtor continues to operate and manage its affairs as debtor and debtor-in-possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No committee has yet been appointed or designated in the Case.

B. The Debtor Has Been Diligent in its Attempts to Complete the Documents

The Debtor has been diligently administering the Case for the benefit of their creditors since the filing just two weeks ago, including negotiating with their senior secured creditor regarding the use of cash collateral and obtaining approval of the use of cash collateral, obtaining approval from the Court to maintain certain of its bank accounts while it transitions the payment of valuable accounts receivables from their pre-petition bank accounts into its debtor-in-possession accounts, contacting insurance companies to

1 ensure that the transition occurs immediately and efficiently, contacting their banks to
2 close pre-petition accounts, preparing and submitting the 7-day packages to the Office of
3 the United States Trustee ("OUST"), and preparing detailed schedules to be filed with the
4 Court. In addition, the Debtor has sought and obtained an order authorizing Debtor's
5 secured creditor, Transportation Alliance Bank Inc. dba TAB Bank ("TAB Bank"), to honor
6 pre-petition payroll checks and other pre-petition checks on an interim basis.

7 Despite the significant progress that has been made, in light of the issues
8 reconciling it's books and records relating to honoring the pre-petition checks, the Debtor
9 requires an extension of fourteen (14) days in addition to the fourteen (14) days allowed
10 by the Bankruptcy Rules. The examination of the Debtor pursuant to 11 U.S.C. 341(a) is
11 set for October 18, 2019 and all Documents will be filed prior to the meeting. The Debtor
12 submits that this extension is reasonable and will allow it to file more accurate and
13 complete Documents, benefitting all parties-in-interest.

14 **III. REQUEST FOR EXTENSION OF TIME TO FILE THE REQUIRED DOCUMENTS**

15 Section 521 of the Bankruptcy Code requires that the Debtor "file a list of creditors,
16 and unless the court orders otherwise, a schedule of assets and liabilities, a schedule of
17 current income and current expenditures, and a statement of the debtor's financial
18 affairs...." 11 U.S.C. § 521(a). Pursuant to Bankruptcy Rule 1007(c) and Local Rule
19 1007-1, if no extension of time has been granted, the Debtor must file the Documents
20 within fourteen (14) days from the date of the filing of their bankruptcy petitions. However,
21 Bankruptcy Rule 1007(c) also provides that an extension of time for the filing of the
22 Documents may be granted "on motion for cause shown and on notice to the United
23 States Trustee" Fed. R. Bankr. P. 1007(c).

24 The Debtor's fourteen-day period expires on September 30, 2019. Reconciling the
25 Debtor's bank accounts relating to all pre-petition transactions is information that needs to
26 be included in the Documents. Given the foregoing, the Debtor requires a modest
27 extension to during which the Debtor will continue to compile the balance of the
28

1 information for the Documents necessary to ensure that accurate and complete
2 Documents will be filed.

3 Pursuant to Bankruptcy Rule 1007(c) and Local Rule 1007-1(b), the Debtor
4 requests an additional fourteen (14) calendar days, up to and including October 14, 2019,
5 within which to file the Documents. Because the requested extension of time: (i) is
6 reasonable, (ii) will allow the Debtor to file more accurate Documents, and (iii) will not
7 prejudice creditors or the OUST, the Debtor believes that cause has been shown for the
8 requested fourteen (14) day extension from the current September 30, 2019 deadline to
9 October 14, 2019. The Debtor reserves the right to seek further extensions.

10 **IV. CONCLUSION**

11 WHEREFORE, to facilitate the efficient administration of the Case, and allow the
12 Debtor adequate time to file complete and accurate Documents, the Debtor requests that
13 the Court enter an order granting the Debtor a fourteen (14) day extension from
14 September 30, 2019 to October 14, 2019, to file the Documents.

15
16 Dated: September 30, 2019

WEILAND GOLDEN GOODRICH LLP

17
18 By: /s/ Reem J. Bello

JEFFREY I. GOLDEN

REEM J. BELLO

Proposed Attorneys for Debtor and
Debtor-in-Possession

DECLARATION OF REEM J. BELLO

I, Reem J. Bello, declare as follows:

1. I am an attorney duly licensed to practice in the courts of California and the Central District of California. I am a partner at the law offices of Weiland Golden Goodrich LLP (the "Firm"), proposed counsel for Coastal International, Inc., the debtor and debtor-in-possession in the above-captioned bankruptcy case (the "Debtor"). The following matters are true and correct and within my own personal knowledge and belief, and if called as a witness, I could and would competently testify thereto.

2. On September 15, 2018 (the "Petition Date"), the Debtor filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code in the United States Bankruptcy Court for the Central District of California (the "Court"). The Debtor continues to operate and manage its affairs as debtor and debtor-in-possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No committee has yet been appointed or designated in the Case.

3. The Debtor has been diligently administering the Case for the benefit of their creditors since the filing just two weeks ago, including negotiating with their senior secured creditor regarding the use of cash collateral and obtaining approval of the use of cash collateral, obtaining approval from the Court to maintain certain of its bank accounts while it transitions the payment of valuable accounts receivables from their pre-petition bank accounts into its debtor-in-possession accounts, contacting insurance companies to ensure that the transition occurs immediately and efficiently, contacting their banks to close pre-petition accounts and secure monies for creditors, preparing and submitting the 7-day packages to the Office of the United States Trustee ("OUST"), and preparing detailed schedules to be filed with the Court. In addition, the Debtor has sought and obtained an order authorizing Debtor's secured creditor, Transportation Alliance Bank Inc. dba TAB Bank ("TAB Bank") to honor pre-petition checks on an interim basis.

1 4. Despite the significant progress that has been made, in light of the issues
2 reconciling its books and records relating to honoring the pre-petition payroll checks, the
3 Debtor requires an extension of fourteen (14) days in addition to the fourteen (14) days
4 allowed by the Bankruptcy Rules. The examination of the Debtor pursuant to 11 U.S.C.
5 341(a) is set for October 18, 2019 and all Documents will be filed prior to the meeting.

6 5. The Debtor submits that this extension is reasonable and will allow it to file
7 more accurate and complete Documents, benefitting all parties-in-interest.

8 I declare under penalty of perjury that the foregoing is true and correct.

9 Executed on this 30th day of September, 2019, at Costa Mesa, California.

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11 /s/ REEM J. BELLO

12 Reem J. Bello
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PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

650 Town Center Drive, Suite 600, Costa Mesa, California 92626

A true and correct copy of the foregoing document entitled (*specify*): **NOTICE OF EX PARTE MOTION AND EX PARTE MOTION FOR AN ORDER EXTENDING TIME WITHIN WHICH DEBTOR MUST FILE SCHEDULES OF ASSETS AND LIABILITIES AND STATEMENT OF FINANCIAL AFFAIRS AND OTHER REQUIRED DOCUMENTS AS LISTED IN THE COURT'S DEFICIENCY NOTICE PURSUANT TO FEDERAL RULE OF BANKRUPTCY PROCEDURE 1007C AND LOCAL BANKRUPTCY RULE 1007; MEMORANDUM OF POINTS AND AUTHORITIES AND DECLARATION OF REEM J. BELLO IN SUPPORT THEREOF** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner indicated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) **September 30, 2019**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (*date*) **September 30, 2019**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☒ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) **September 30, 2019**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

The Honorable Theodor C. Albert, 411 W. 4th Street, 5th Floor, Santa Ana, CA 92701

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

September 30, 2019

Date

Kelly Adele

Printed Name



Signature

SERVICE LIST

Office of the United States Trustee
Attn: Nancy Goldenberg
411 W. Fourth Street, Suite 7160
Santa Ana, CA 92701

Global Experience Specialist
c/o David Emerzian
McCormick, Barstow, Sheppard, Wayte
7647 N. Fresno Street
Fresno, CA 93720

AmTrust North America
Attn: Accounts Receivable
800 Superior Ave. E
21st Floor
Cleveland, OH 44114

American Express Corp. Svcs.
Attn: US Payment FL
1801 NW 66th Ave
Suite 103A
Fort Lauderdale, FL 33313

Anthem Blue Cross
PO Box 51011
Los Angeles, CA 90051-5311

Boone, Mike
4065 Lavergne
Antioch, TN 37013

Chicago Regional Council of Carpenters
12 East Erie Street
Chicago, IL 60611-2796

Cowperthwait, Shelley
6802 Bayberry Creek
Las Vegas, NV 89130

Gorman, Michael
11 Jeffrey Lane
Hightstown, NJ 08520

Johnson, Amy
543 Wisteria Way
San Rafael, CA 94903

Laborers Trust Fund for Northern CA
PO Box 882913
San Francisco, CA 94188-2913

Lopez, Jesus
4585 San Juan Avenue
Fremont, CA 94536

Northern California Carpenters Fund
PO Box 882134
San Francisco, CA 94188-2134

Randall, Dee
38 Red Hill Circle
Belvedere Tiburon, CA 94920

Shell Fleet Plus- WEX BANK
PO Box 4337
Carol Stream, IL 60197-4337

Sign Pictorial Display Industry Allied
PO Box 45186
San Francisco, CA 94145

Spangler, Kathleen
554 16th Avenue
San Francisco, CA 94118

Teamsters Local 631 Security Fund
PO Box 844552
Los Angeles, CA 90084-4552

Trust Fund Office Local Union 831 STD
PO Box 513435
Los Angeles, CA 90051-3435

Western Conference of Teamsters
2323 Eastlake Avenue East
Seattle, WA 98102-3393

Willwork Global Event Services
23 Norfolk Avenue
Suite A
South Easton, MA 02375

Electronic Mail Notice List

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